

Federal Defenders
OF NEW YORK, INC.

Southern District
81 Main Street, Suite 300
White Plains, NY 10007
Tel: (914) 428-7124 Fax: (914) 948-5109

Tamara Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

MEMO ENDORSED

July 10, 2024

VIA EMAIL and ECF

The Hon. Nelson Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

In light of a pretrial disposition reached in principle, Deft.'s request to adjourn the filing of any motions from July 15, 2024 until Aug. 15, 2024 is GRANTED without objection by the Gov't. Counsel are directed to notify the Court when a plea has been scheduled. Clerk of Court is requested to terminate the motion at ECF No. 30.


Dated: White Plains, NY

July 10, 2024

Re: *United States v. Jeffrey Tognetti, Jr.*, 23-cr-453 (NSR)

Dear Judge Román,

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Defendant, with the consent of the government, respectfully requests that the Court adjourn the currently-scheduled motions deadline of July 15, 2024 to August 15, 2024.

On June 13, 2024, the Court advised defense counsel to request an extension of the motions schedule if a plea disposition is likely. *See* June 13, 2024, Minute Entry.

To that end, the parties have reached a plea agreement in principle. The government is currently collecting documents with regard to an outstanding sentencing enhancement. The parties are going to meet on July 25, 2024 to review said documents. After that, the parties intend to schedule a plea.

As such, Mr. Tognetti requests a one-month adjournment of the motions deadline. The government has no objection. Time is already excluded through September 17, 2024.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 07/10/2024

Respectfully,



Rachel S. Martin

cc: Jennifer Ong, AUSA